

PROGRESS REVIEW MEETING MINUTES NAS ALAMEDA

Date: February 14, 1995, Tuesday
Time: 8:30 am - 5:30 pm
Place: Building 1, NAS Alameda, Alameda, California

Attendees:

<u>NAME</u>	<u>ORGANIZATION</u>	<u>PHONE</u>
John Hunt	A-N West Engineers	(510) 451-2133
Tom Lanphar	Cal-EPA (Dept. Toxic Substances Control [DTSC])	(510) 540-3809
James Nusrata	Calif. Regional Water Quality Control Board (RWQCB)	(510) 286-0301
Tim Ault	IT Corporation	(510) 372-9100
Dan Baden	IT Corporation	(510) 372-9100
Ken Leung	Montgomery Watson	(510) 975-3460
Mike Petouhoff	Naval Air Station (NAS) Alameda Environmental Office	(510) 263-3726
Teresa Bernhard	NAS Alameda	(510) 263-3723
Ann Klimek	NAS Alameda	(510) 263-3729
Roger Caswell	Naval Aviation Depot (NADEP) Alameda	(510) 263-6241
Duane Balch	PRC Environmental Management, Inc. (EMI)	(916) 853-4529
Susan Willoughby	PRC EMI	(916) 853-4507
Jeriann Alexander	Subsurface Consultants Inc.	(510) 268-0461
R. William Rudolph	Subsurface Consultants Inc.	(510) 268-0461
James Ricks, Jr.	U.S. Environmental Protection Agency	(415) 744-2402
Stewart Cheang	U.S. Navy, Engineering Field Activity West (EFAW)	(415) 244-2528
George Kikugawa	U.S. Navy, EFAW	(415) 244-2549
Larry Lind	U.S. Navy, EFAW	(415) 244-2527
Dennis Wong	U.S. Navy, EFAW	(415) 244-2526

Agenda:

Item: #1 Interim Remedial Action - Site 7A and Site 14 and 18 Removals
Opening: EFAW/PRC/NAS Alameda
Process: Discuss status of EE/CA for Site 7A (action levels, tank removal data, Nick Bollo's comments, schedule).
Site 14 update from EFAW.
Site 18 - Discuss strategy. Could NAS prepare a "streamlined" EE/CA? Could the agencies work out a strategy for reviewing/approving a streamlined EE/CA?
Goal: Update project team, reprioritize actions as needed, and identify key process deadlines.
Closing: Site 7A: PRC indicated that action levels need to be selected for the chemicals of concern, principally benzene in soil. Scope of Navy's EE/CA to address soil only. The facility recently removed the waste oil and solvent underground storage tanks (USTs) at Building 457. An oil sheen was reportedly observed on the water in the tank pit. Tom Lanphar (DTSC) requested that the Navy provide him with a written report on the UST pulls. The two abandoned gasoline

USTs are slated for extraction by April. The group briefly discussed the logistics of working at an active gas station, which precludes pulling one of the inactive gasoline tanks nested with three other active USTs, essentially preventing implementation of the EE/CA recommendations. Based on current operations the implementation of the EE/CA would occur after November 1995. Tom Lanphar mentioned that he expected that excavated UST soils would go into his proposed "soil management unit" to be located somewhere on base (a potential candidate site might be inside Building 410, an empty paint-stripping hangar building).

DTSC's Tom Lanphar passed out copies of Senate Bill (SB) 1706 and made a presentation concerning this new state law on removal actions which became effective January 1, 1995. SB 1706 removal action requirements are essentially similar to those provided for the preparation of EE/CAs under CERCLA, but with a different reporting emphasis and specified monetary limits on cleanups that effect the level of required documentation. Navy legal counsel will be reviewing SB 1706 as it relates to Navy stance to continue doing removal actions following federal guidelines. Tom Lanphar indicates that he will investigate DTSC's requirements for interim RAPs.

Further discussion of Site 7A centered on using an approach for only doing soil removal associated with the UST excavations, and performing a treatability study for impacted groundwater; as several questions were raised by the group concerning the appropriateness of doing an EE/CA at what is essentially a typical "gasoline station" UST release site. PRC stated that it was considering developing action levels for impacted UST site soils at NAS Alameda modeled on a RWQCB-accepted approach used for petroleum USTs at Moffett Field.

Site 14: The Navy stated that it continues to pursue contractual activities with IT Corporation to conduct an EE/CA and soil removal at the former Fire Training Area (Site 14). Award is expected by April 24, with implementation in 170 days.

Site 18: The group discussed a removal action that would include clean out of the storm drain system and stockpiling of impacted sediments for treatment. PRC updated the group on its efforts to consider establishment of a corrective action management unit (CAMU) at NAS Alameda for storage and treatment of impacted soil and sediments that are generated during removal actions (and UST pulls). Tom suggested that the new state law (SB 1706) would allow stockpiling of soil as part of the "removal action plan" without instituting a CAMU. Essentially, the removal action work plan (= EE/CA) would be required before the state would allow stockpiling. State law would require that the action meets the substantive permit requirements of a RCRA permit.

Tom Lanphar's perspective on the Site 18 removal action included the following steps: 1) prepare removal action work plan (does it include a public notice and comment period?), 2) Acquire permit? (Tom Lanphar to get update) either under the new state health and safety code or as part of the CAMU, 3) remove sediment/sludge and stockpile, 4) conduct treatability studies as appropriate, 5) prepare interim RAP, 6) public notice, 7) treat sediment/sludge, and 8) carry site through the feasibility study and on to RAP (or ROD).

Currently IT Corp is sampling selected lengths of the storm drain system. Any future removal and hydrocarbons have been found at catch basins and man-holes near Site 5 and at other action to be taken should be considered "time critical" since very elevated levels of metals IRP sites and, should heavy rains occur next winter, the potential for impacts to the Oakland Inner Harbor and Seaplane Lagoon is high. Treatment of the removed sediment, sludge and water would not be "time critical" but rather be conducted as part of a treatability study.

Action Items: Tom Lanphar to provide additional clarification on SB 1706 requirements (including permits); Navy legal counsel will review same; PRC to develop petroleum cleanup level position paper for application to UST sites, and will provide input on possible removal scenarios for Site 18 to EFAW; and the project team as a whole will give consideration to developing a modified removal action process that is streamlined and meets both federal guidance and state law.

Item: #2 RI/FS Status
Opening: PRC/EFAW/NAS Alameda
Process: Discussion items included:

- Data Transmittal Memoranda
- Aquifer Testing Work Plan
- Baseline Human Health Risk Assessment Work Plan
- radiological field survey at Sites 1 & 2
- ARARs response from DTSC
- West Beach Landfill Wetland wells
- Total Dissolved Solids basewide maps
- filtered/unfiltered water analyses
- EBS Phase II data integration (Ann Klimek)

Goal: Update attendees on RI/FS progress.
Closing: Initial discussion covered status of EBS phase IIA field activity by IT Corp. Essentially only soil sampling occurring at parcels under current EBS investigation. IT Corp has budgeted for up to 21 groundwater wells. Team discusses need for PRC and IT to meet in near future to identify appropriate location for selected wells at non-IRP sites. PRC and IT agree to meet April 19 and May 24 to target potential sites as EBS data are received.

Ann Klimek indicates that IT's focus is on reuse, and not necessarily chasing groundwater plumes, though in some areas this may be appropriate (e.g. parcels within/around IRP sites 3 and 5). RWQCB would like to see IT install wells at the edge of plumes; Navy objects to using IT's services in that manner. Ann Klimek goes on to state that IT's priorities should be focused on the ten to 20 parcels already identified for high priority reuse. The RWQCB states that it wants the plumes characterized before the feasibility studies are done, and does not care who installs the wells. Navy indicates that the wells would be installed as part of phase IIB after the phase IIA EBS data are collected and analyzed.

PRC states that the aquifer test work plan and the human health risk assessment work plan are both at the Navy undergoing Navy review. The data transmittal memorandum for recent work at IRP sites 4, 5, 8, 10A, 12, and 14 was distributed for Navy review on January 31. PRC reminds the team that it still needs to negotiate chemicals of concern and human health/ecological risk assessment issues with the regulatory agencies.

The DTSC says it's still working on responding to Navy requests for the state's ARARs. DTSC stated at the January 18, 1995, review meeting they would provide ARARs by January 31, pending receipt of ARARs from other state agencies. Navy reminds DTSC that ARARs are critical for assisting in the timely completion of the Site 14 removal action. If Navy and DTSC agree on ARARs, an appropriate cleanup action level for the Site 14 removal action can be selected and the Navy can then estimate how much soil will need to be excavated/treated. This issue has Davis-Bacon Act implications as the Navy has requested IT Corp to do both the EE/CA

and removal action implementation. The Navy would be doing the "design," because the Navy would tell IT Corp the volume of soils to excavate and treat.

With respect to beneficial use of groundwater issues, PRC indicated it was generating base-wide TDS maps for discussion with the Navy and regulators. After Navy review draft copies of maps would be forwarded to the BCT and RWQCB.

Wetland wells at the wetland/landfill boundary within IRP site 2 were briefly discussed. Concerns were brought up about exact locations along the edge of the wetland/landfill interface and about installing wells within the wetland area itself. The group decided that for preparation of a wetland/landfill wells work plan addendum, only wells along the interface would be considered, and that pending future chemical analyses of the soil and groundwater from these new interface wells, subsequent discussions would entertain the need of additional wells within the landfill. PRC and EFAW indicated they would look into permit issues related to putting wells at the edge of, and within, the wetland, and would inquire about similar activities that have occurred at NWS Concord.

James Nusrala stated RWQCB's desire to get unfiltered water samples during quarterly monitoring at NAS Alameda. EFAW indicated that the Navy would be inclined to consider RWQCB's request but wished to discuss the number of wells actually sampled, and for what purpose the RWQCB would apply the new data. RWQCB also said they would like the data collected during the Spring quarter of sampling. EFAW said they would provide a letter response to the RWQCB.

The radiological survey at Sites 1 and 2 did not begin on February 6 as planned due to DTSC concerns about starting the field work before DTSC comments from Sacramento had been received and addressed by the Navy. DTSC (Sacramento) comments were received by Navy on February 6, and Navy/PRC are preparing responses to these comments.

Item: #3 Community Relations Issues
Opening: BCT/EFAW/PRC
Process: Discuss proposed presentations for RAB
Goal: Clarify scope of proposed presentations
Closing: Mike Petouhoff gives a summary of his plans for providing restoration advisory board (RAB) presentations on subjects that the RAB desires clarification. Mike indicates that both Navy guidance (Section IV.F.(2)(c), dated October 18, 1994) and DOD/EPA guidance (page 9, "Training for RAB Community Members," dated September 27, 1994) specify RAB support along the lines of informative or educational workshops or presentations. Mike subsequently gives tentative dates and subject matter information for monthly RAB training/workshops during the next six months.

March 18	Documents/Process to ROD
April 8	Early Actions
April 29	Risk Assessments

Subsequent training would cover site characterization, cleanup technologies, and geological overviews.

Item: #4 BRAC Cleanup Plan Update-Response to Comments
Opening: BCT/EFAW/PRC
Process: Overview of comments not currently addressed.

Goal: Identify and task appropriate team members to prepare responses to comments.
Closing: The BRAC Cleanup Team (BCT) had just received their draft BCP revision on February 13, and was not ready to discuss details or changes made to the draft BCP. The Navy and the BCT agreed to meet next week on February 22, 1995, to discuss changes and assign responsible staff for editing sections within the draft BCP revision.

Item #5 Fuel Line Removal

Opening: Larry Lind/EFAW

Process: Provide BCT with some details of the A-E proposal for fuel line removal.

Goal: BCT to evaluate review time needed and provide ideas/criteria for the proposal format and content.

Closing: Larry Lind began by introducing personnel from A-N West and Subsurface Consultants who had been tasked to begin investigations of abandoned fuel lines at NAS Alameda. A presentation was made showing lines investigated and preliminary chemical analyses. Subsurface Consultants will be preparing work plans and plans and specifications for further sampling and excavation of the abandoned lines.

Concerns about controlling groundwater during line removal, handling and reuse of excavated materials, soil/water disposal issues, and proposed sample analytes were discussed. DTSC and EPA voiced strong concern about not knowing that the work presented today had occurred and wanted to be better informed so as to have had some input into the work already performed, and any future work. Larry Lind stated that the fuel line issues had been discussed previously with the RWQCB (lead agency with respect to USTs). Larry Lind also indicated that he would like to consider sending impacted soils to an off-site thermal treatment facility, to which DTSC's Tom Lanphar objected since he felt that the Navy was open to creating an on-base "soil management unit." PRC mentioned that an alternative to a "soil management unit" might be a corrective action management unit or "CAMU" which could be used to handle all impacted soils regardless of which program they were generated under.

Larry said that the soil management unit issue would be partially controlled by the amount of affected soil that has to be handled, and that he could not know that volume until the analytical results come in after excavation. Conversely, the contractors need to know what the disposal options are so that they can develop their plans and specifications accordingly.

Key issues: better communication between regulators (RWQCB and the BCT), between Navy facility and Navy UST/fuel line groups (NAS Alameda and the EFAW UST group), and resolution as to where and how impacted soils are going to be handled regardless of whether or not it's a activity for a removal action, UST pull or fuel line excavation (BCT/EFAW/PRC).

Item: #6 All Other Issues

Opening: Attendees

Process: Open discussion of other issues to be considered.

Goal: To summarize previously discussed action items and group tasks.

Closing: Additional meetings, other than the RAB workshops listed above, were tentatively scheduled as follows:

February 22, 1995	BCP update
March 7, 1995	March 18 RAB training dry-run; RAB meeting
March 14, 1995	Monthly review meeting
April 19, 1995	Groundwater meeting with IT Corp

May 24, 1995

Monthly review meeting



TETRA TECH EM INC.

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1230 Columbia Street, Suite 1100
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FROM:

[Signature]

Michael Wanta, Contract Manager

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